

# Fact Sheet



## For Proposed Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on March 3, 2015.

Permit Number: **R30-03900001-2015 (4 of 5)**  
Application Received: **November 16, 2016**  
Plant Identification Number: **03-54-03900001**  
Permittee: **The Chemours Company FC, LLC**  
Facility Name: **Belle Plant**  
Mailing Address: **901 W. DuPont Ave.**  
**Belle, WV 25015**

Permit Action Number: *MM01*      Revised: *Proposed*

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|                    |   |
|--------------------|---|
| Physical Location: | Belle, Kanawha County, West Virginia                                      |
| UTM Coordinates:   | 451.90 km Easting • 4232.60 km Northing • Zone 17                         |
| Directions:        | US Route 60 exit, then right onto Dupont Avenue, then left at plant gate. |

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### Facility Description

Manufacturer of various organic chemicals. Production of "Vazo" and glycolic acid.  
SIC codes: 2869; 2879

### Emissions Summary

There are no changes in emissions as a result of this Minor Modification.

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit more than 393 TPY of CO, 1,228 TPY of NO<sub>x</sub>, and 663 TPY of VOC's. Due to this facility's potential to emit over 100 TPY of CO, NO<sub>x</sub>, and VOC's, as well as over 10 TPY of any single HAP and 25 TPY for total HAP's facility wide, Chemours' Belle Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

|                    |                                 |  |
|--------------------|---------------------------------|--|
| Federal and State: | 45CSR30                         | Operating permit requirement.                                      |
|                    | 45CSR34                         | Emission Standards for HAPs pursuant to 40 C.F.R. Parts 61 and 63. |
|                    | 40 C.F.R. Part 63, Subpart FFFF | Miscellaneous Organic NESHAP                                       |

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

## Active Permits/Consent Orders

| Permit or<br>Consent Order Number | Date of<br>Issuance | Permit Determinations or Amendments That<br>Affect the Permit ( <i>if any</i> ) |
|-----------------------------------|---------------------|---|
| N/A                               | N/A                 |   |

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

## Determinations and Justifications

### **40CFR63, Subpart FFFF – Miscellaneous Organic NESHAP**

The Flare (SB001) used in the VAZO process used a flare interlock switch with a temperature limit. The facility will change the monitoring of the flare flame presence by using a more advanced thermocouple. 40CFR§63.2450(e)(2) requires the Permittee to meet the requirements of 40CFR§63.982(b) which references 40CFR§63.987 for flares. 40CFR§63.987(c) requires flare monitoring equipment including but not limited to a thermocouple to be used to continuously detect that the flare flame is present. Condition 4.2.7 has been revised accordingly. Condition 4.4.4 has been added for recordkeeping requirements or 40CFR§63.998(a)(1), which include keeping records of whether the flare monitor is continuously operating, if the flare flame is continuously present, and any times that the flare flame is absent. Condition 4.5.6 requires periodic reporting from 40CFR§§63.999(c)(1) and (3) that include periods when all pilot flames were absent or the flare flame was absent.

## Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

None

## **Request for Variances or Alternatives**

None

## **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

## **Comment Period**

Beginning Date: N/A

Ending Date: N/A

## **Point of Contact**

All written comments should be addressed to the following individual and office:

Mike Egnor  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478  
michael.egnor@wv.gov

## **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

## **Response to Comments (Statement of Basis)**

(Choose) Not applicable.

**OR**

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.